

LISA HOGAN, ESQ. (*pro hac vice* forthcoming)
lhogan@bhfs.com
BROWNSTEIN HYATT FABER SCHRECK LLP
410 17th Street, Suite 2200
Denver, CO 80202
Telephone: 303.223.1100
Facsimile: 303.23.1111

TRAVIS F. CHANCE, ESQ., Nevada Bar No. 13800
tchance@bhfs.com
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

*Attorneys for Defendants Area 15 Las Vegas LLC and Area
15 Global LLC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GEORGE JARAMILLO, III, an individual,

Plaintiff,

v.

AREA 15 LAS VEGAS LLC, a Delaware
Limited Liability Company, AREA 15
GLOBAL LLC, a Delaware Limited
Liability Company, ARNOLD FISHER, an
Individual, KENNETH FISHER, an
Individual, STEVEN FISHER, an
Individual, WINSTON FISHER, an
Individual, FISHER BROTHERS
MANAGEMENT CO. LLC, a New York
Limited Liability Company, FISHER
BROTHERS FINANCIAL AND
DEVELOPMENT COMPANY LLC, a
New York Limited Liability Company, and
DOES 1-50 Inclusive,

Defendant.

CASE NO.: 2:21-cv-00891-RFB-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Plaintiff GEORGE JARAMILLO, III (“Plaintiff”), by and through his undersigned counsel of record, the law firms of Brown, Clark, Le, Ames, Stedman & Cevallos LLP and Kaplan Cottner, and Defendants AREA 15 LAS VEGAS LLC (“Area 15 LV”) and AREA 15 GLOBAL LLC (“Area 15 Global”) (together, “Defendants”), by and through their undersigned counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate to an extension of time to

1 respond to the Complaint, pursuant to FRCP 6(b) and LR IA 6-1, as set forth below:

2 1. On May 6, 2021, Plaintiff GEORGE JARAMILLO, III (“Plaintiff”) filed his
3 Complaint in this Court against Defendants and other named parties. *See generally* ECF No. 1.

4 2. On May 10, 2021, Area 15 LV and Area 15 Global were each served with a
5 Summons and the Complaint. *See generally* ECF Nos. 6-7.

6 3. Defendants’ deadline to respond to the Complaint is June 1, 2021. *See generally*
7 FRCP 12(a)(1)(A)(i).

8 4. This Court may extend the deadline to respond to the Complaint for good cause. *See*
9 FRCP 6(b)(1).

10 5. There is good cause to grant an extension of 30 days’ time to respond to the
11 Complaint. Both counsel for Defendants, Lisa Hogan and Travis F. Chance, are in the midst of
12 preparing for and participating in trials. Ms. Hogan has a jury trial beginning in Denver District
13 Court, on Friday, June 4, 2021, Case Number 2020CV32175, for which she has been preparing
14 over the last several weeks. Mr. Chance began a bench trial in the Eighth Judicial District Court,
15 Clark County Nevada, Case Number A-19-795091-B, on May 10, 2021, which was suspended on
16 May 28, 2021 and will be continued for a third week on a date to be determined but most likely
17 resuming June 7, 2021. Due to counsel’s unavoidable trial schedules, an extension to respond to
18 the Complaint will allow them further opportunity to more fully evaluate and investigate the
19 Complaint’s 102 factual allegations and prepare the proper response thereto.

20 6. The instant request is timely, as the deadline for Defendants to respond to the
21 Complaint is June 1, 2021. *See* FRCP 6(b)(2) (only requiring an analysis of excusable neglect where
22 extension sought after expiration of the deadline); LR IA 6-1(a) (same).

23 7. This is Defendants’ first request for an extension of time to respond to the
24 Complaint.

25 8. Defendants expressly reserve any and all defenses available to them, including, but
26 not limited to, those set forth in FRCP 12(b)(1)-(7).

27 9. The parties make the instant request in good faith and without any intent to delay
28 these proceedings.

Based on the foregoing, Plaintiff and Defendants stipulate to a 30 day extension of time for Defendants to respond to the Complaint, through and including July 1, 2021.

DATED this 1st day of June, 2021.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

KAPLAN COTTNER

BY: /s/ Travis F. Chance

LISA HOGAN, ESQ. (*pro hac vice* forthcoming)

lhogan@bhfs.com

TRAVIS F. CHANCE, ESQ., Nevada Bar No. 13800

tchance@bhfs.com

*Attorneys for Defendants Area 15 Las Vegas LLC and
Area 15 Global LLC*

BY: /s/ Kory L. Kaplan

KORY L. KAPLAN, ESQ.

Email: kory@kaplancottner.com

850 E. Bonneville Ave.

Las Vegas, Nevada 89101

Telephone: (702) 381-8888

Facsimile: (702) 832-5559

BROWN, CLARK, LE, AMES,
STEDMAN & CEVALLOS LLP
Edwin B. Brown (*pro hac vice*
pending)

*Attorneys for Plaintiff George
Jaramillo, III*

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated June 4, 2021